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Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of themselves and
all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF MARIE
HAYRAPETIAN IN SUPPORT OF
GOOGLE LLC'S ADMINISTRATIVE
MOTION TO SEAL PORTIONS OF THE
APRIL 21, 2022 HEARING TRANSCRIPT**

Judge: Hon. Susan van Keulen, USMJ

1 I, Marie Hayrapetian, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant, Google LLC (“Google”) in this action.
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google
7 LLC’s Administrative Motion To Seal Portions Of The April 21, 2022 Hearing Transcript. In
8 making this request, Google has carefully considered the relevant legal standard and policy
9 considerations outlined in Civil Local Rule 79-5. Google makes this request with the good faith
10 belief that certain information sought to be sealed consists of Google’s confidential information and
11 that public disclosure could cause competitive harm.

12 3. Google respectfully requests that the Court seal the redacted portions of the April 21,
13 2022 Hearing Transcript (“Transcript”).

14 4. The information requested to be sealed contains Google’s non-public, sensitive
15 confidential and proprietary business information that could affect Google’s competitive standing
16 and may expose Google to increased security risks if publicly disclosed, including details related to
17 Google’s internal projects, internal identifiers, data signals and logs, and their proprietary
18 functionalities, as well as internal metrics, which Google maintains as confidential in the ordinary
19 course of its business and is not generally known to the public or Google’s competitors.

20 5. Such highly confidential information reveals Google’s internal strategy and systems
21 regarding various important products and nonpublic investigations thereto and falls within the
22 protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. The redacted
23 portions also contain, summarize or reflect material designated, Confidential or Highly Confidential
24 – Attorneys’ Eyes Only Pursuant to Stipulated Protective Order.

25 6. Public disclosure of such highly confidential information could affect Google’s
26 competitive standing as competitors may alter their system designs and practices relating to
27 competing products, time strategic litigation, focus their patent prosecution strategies, or otherwise
28 unfairly compete with Google. It may also place Google at an increased risk of cybersecurity threats,

1 as third parties may seek to use the information to compromise Google's internal systems and
2 operations.

3 7. For these reasons, Google respectfully requests that the Court order the identified
4 portions of Transcript to be sealed.

5 I declare under penalty of perjury of the laws of the United States that the foregoing is true
6 and correct. Executed in Los Angeles, California on June 27, 2022.

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8 DATED: June 27, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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11 By /s/ Marie Hayrapetian
12 Marie Hayrapetian
13 *Attorney for Defendant*
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